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Travis Call, Sarah Cavanagh,
Julia Longenecker, Pedro Noyola &
Christopher Sulit

IN THE UNITED STATES DISTRICT COURT

THE NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO

JAMES BRADY, TRAVIS CALL,
SARAH CAVANAGH, JULIA
LONGENECKER, PEDRO NOYOLA
and CHRISTOPHER SULIT, individually
and on behalf of all others similarly
situated,

Plaintiffs,

vs.

DELOITTE & TOUCHE LLP, a limited
liability partnership; DELOITTE TAX
LLP; and DOES 1-10, inclusive,

Defendants.

CASE NO.: C-08-00177 SI

**STIPULATION RE: FILING DATE
OF SECOND AMENDED
COMPLAINT**

1 Representative Plaintiffs JAMES BRADY, TRAVIS CALL, SARAH CAVANAGH,
2 JULIA LONGENECKER, PEDRO NOYOLA and CHRISTOPHER SULIT
3 (“Plaintiffs”), request as follows:
4

5 1. Whereas on May 30, 2008, the Court ordered Plaintiffs to file an
6 amended complaint (“Second Amended Complaint”) clarifying the scope of the
7 putative class by June 13, 2008.
8

9 2. Whereas the plaintiff in the case of *Stepan Mekhitarian v. Deloitte &*
10 *Touche, (ICS) LLC and Deloitte Tax, LLP*, Case No. CV-07-00412-DSF (MAN)
11 (“*Mekhitarian*”) in the Central District of California is expected to file a motion for
12 class certification on approximately June 13, 2008 on behalf of certain Tax
13 employees of Defendants.
14

15 3. Whereas it will facilitate Plaintiffs here in clarifying the scope of the
16 putative class in this case by seeing the scope of the class sought in *Mekhitarian* when
17 the class certification motion is filed in that case.
18

19 4. Whereas the Further Status Conference in this case is set for August 15,
20 2008.
21

22 5. Plaintiffs and Defendants agree that Plaintiffs may file their Second
23 Amended Complaint by June 30, 2008. Plaintiffs and Defendants also agree to stay
24 discovery until Plaintiffs file their Second Amended Complaint.
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COUNSEL FOR PLAINTIFFS

DATE: June 11, 2008

By: /s/ WILLIAM A. BAIRD
WILLIAM A. BAIRD
Milstein, Adelman & Kreger, LLP

COUNSEL FOR DEFENDANTS

DATE: June 11, 2008

By: /s/ REGINA A. MUSOLINO
Regina A. Musolino
Seyfarth Shaw LLP